

# Exhibit E

**Pixton, Allan**

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**From:** Pixton, Allan  
**Sent:** Monday, July 28, 2014 12:18 PM  
**To:** 'susan@aikenandscoptur.com'; 'vince@aikenandscoptur.com'  
**Cc:** Feller, Leonid  
**Subject:** Kandziora v. Gen. Motors LLC, et al., No. 2:14-cv-00801 (E.D. Wis.)  
**Attachments:** GM - Ignition Switch - Scheduling Order - As Entered.pdf; 2014\_07\_01 BANKR Supp Scheduling Order re Sale Order Enforcement - ECF 12770.pdf; GM - Ignition Switch - Order Approving Motion to Establish Procedures fo....pdf; Kandziora Stipulation Staying Action ED Wis.docx; GM - Ignition Switch - Fifth Supplement to Schedule 1.pdf; GM - Ignition Switch - Fifth Supplement to Schedule 2.pdf

Susan and Vince,

Thanks for returning my call. Per our discussion, please see the email below and attachments.

Best Regards,

Allan

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We are co-counsel for General Motors LLC ("New GM"). You previously commenced an Action against New GM asserting certain claims based on an alleged defect in ignition switches in certain vehicles. In connection therewith, on April 21, 2014, New GM filed a Motion to Enforce the Sale Order and Injunction with the United States Bankruptcy Court for the Southern District of New York ("Bankruptcy Court"). On May 16, 2014, the Bankruptcy Court issued a Scheduling Order ("Scheduling Order") establishing certain procedures for addressing issues raised in the Motion to Enforce. A Supplemental Scheduling Order ("Supplemental Scheduling Order") was entered by the Bankruptcy Court on July 11, 2014. Copies of the Scheduling Order and Supplemental Scheduling Order are attached hereto. The form of the Scheduling Order and Supplemental Scheduling Order presented to the Bankruptcy Court were negotiated with and approved by counsel representing certain of the Plaintiffs who have filed Actions against New GM ("Designated Counsel"). Designated Counsel appeared at the May 2, 2014 Bankruptcy Court hearing and spoke on behalf of the clear majority of Plaintiffs. They have agreed to try and coordinate the efforts of Plaintiffs' counsel in this matter. Contact information for Designated Counsel is as follows:

1. Edward Weisfelner – email: [eweisfelner@brownrudnick.com](mailto:eweisfelner@brownrudnick.com); phone: 212-209-4900
2. Howard Steel – e-mail: [hsteel@brownrudnick.com](mailto:hsteel@brownrudnick.com); phone: 212-209-4917
3. Sander Esserman – e-mail: [esserman@sbep-law.com](mailto:esserman@sbep-law.com); phone: 214-969-4910
4. Peter Lockwood – e-mail: [plockwood@capdale.com](mailto:plockwood@capdale.com); phone: 202-862-5065

On July 8, 2014, the Bankruptcy Court issued an Order to Establish Procedures for Newly-Filed Ignition Switch Actions ("Newly-Filed VIS Action Procedures Order"). A copy of the Newly-Filed VIS Action Procedures Order is attached hereto. Pursuant to the Newly-Filed VIS Action Procedures Order, all Plaintiffs that have commenced Actions against New GM after the filing of the notice of settlement of the Scheduling Order have three (3) business days from receipt of a Stay Stipulation and Scheduling Order to (a) enter into a Stay Stipulation by executing the same and returning it to New GM's counsel, or (b) file a No Stay Pleading with the Bankruptcy Court. Please review the Stay Stipulation and, if you agree to its terms, please sign where indicated and e-mail or fax a copy back to each of the following counsel representing New GM by July 30, 2014:

1. Arthur Steinberg – email: [asteinberg@kslaw.com](mailto:asteinberg@kslaw.com); facsimile: 212-556-2222; phone: 212-556-2158
2. Scott Davidson – e-mail: [sdavidson@kslaw.com](mailto:sdavidson@kslaw.com); facsimile: 212-556-2222; phone: 212-556-2164

3. Richard Godfrey – e-mail: rgodfrey@kirkland.com; facsimile: 312-862-2200; phone: 312-862-2391
4. Andrew Bloomer – e-mail; abloomer@kirkland.com; facsimile: 312-862-2200; phone: 312-862-2482

If you choose not to enter into a Stay Stipulation, pursuant to the Newly-Filed VIS Action Procedures Order, you are required to file a pleading in the Bankruptcy Court by no later than July 30, 2014 setting forth why you should not be directed to stay your Action (“No Stay Pleading”). New GM will file a response to the No Stay Pleading and the Bankruptcy Court will hold a hearing on a date set by the Bankruptcy Court.

Please be advised, pursuant to the terms of the Newly-Filed VIS Action Procedures Order, if any plaintiff chooses not to (i) execute a Stay Stipulation, or (ii) file a No Stay Pleading, the terms of the Stay Stipulation shall automatically be binding on such plaintiff.

To the extent you have previously entered into an agreed stay or extension of time in the court where you commenced your Action, those stipulations and extensions of time remain in effect. However, the Bankruptcy Court’s Order supersedes any prior agreement between the parties. You are therefore required to either execute a Stay Stipulation or file a No Stay Pleading irrespective of any prior agreed stay or extension of time.

If you have any questions, you can contact the above-referenced counsel for New GM, or any of the Designated Counsel.

**R. Allan Pixton | Kirkland & Ellis LLP**  
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